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THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
	:	
DELPHI CORPORATION, INC., <u>et al.</u>	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)

**RESPONSE OF SCHAEFFLER KG TO DEBTORS' NINETEENTH
OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO 11 U.S.C. § 502(b)
AND FED. R. BANKR. P. 3007 TO CERTAIN (A) INSUFFICIENTLY
DOCUMENTED CLAIMS, (B) CLAIMS NOT REFLECTED ON DEBTORS'
BOOKS AND RECORDS, (C) UNTIMELY CLAIM, AND (D) CLAIMS
SUBJECT TO MODIFICATION, TAX CLAIMS SUBJECT TO MODIFICATION,
MODIFIED CLAIMS ASSERTING RECLAMATION, AND CONSENSUALLY
MODIFIED AND REDUCED CLAIMS**

Schaeffler KG ("Schaeffler"), by and through its undersigned counsel, submits this response to the Debtors' Nineteenth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007 To Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected on the Debtors' Books and Records, (C) Untimely Claim, and (D) Claims Subject to Modification, Tax Claims Subject to Modification, Modified Claims Asserting Reclamation, and Consensually Modified and Reduced Claims, dated July 13, 2007 (the "Objection"), and respectfully represents as follows:

BACKGROUND

1. On October 8 and 14, 2005 (the "Petition Dates"), the Debtors filed their voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the

“Bankruptcy Code”). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession under sections 1107(a) and 1108 of the Bankruptcy Code. The Court has ordered joint administration of these cases. No trustee or examiner has been appointed in these cases.

2. On May 16, 2006, Schaeffler filed a proof of claim, claim number 5907 (“Claim No. 5907”), in the amount of \$64,430.50 against Delphi Corporation for debt that was incurred between November 6, 2004 and September 14, 2005.

3. On July 13, 2007, the Debtors filed the Objection wherein they objected to Claim 5907 as a “Claim Subject to Modification”, seeking that it be reduced to the amount of \$9,452.04, on the basis that the amount claimed is inconsistent with the Debtors’ books and records. Further, the Debtors seek to modify Claim No. 5907 by changing the identity of the Debtor against whom the claim is asserted to Delphi Automotive Systems LLC on the basis that the claim was asserted against the wrong Debtor.

RESPONSE TO THE NINETEENTH OMNIBUS OBJECTION

4. Schaeffler does not agree that Claim 5907 should be reduced to \$9,452.04.

5. Schaeffler asserts that the true and correct amount of its claim is 19,800 EUR. This claim is composed of a claim for 8,500 EUR against Delphi Automotive Systems LLC and a claim for 11,300 EUR against Delphi Saginaw Steering Systems.¹ A summary of Schaeffler’s invoices is attached hereto as Exhibit A.

6. Based upon the exchange rate between the Euro and the U.S. Dollar on October 7, 2005, 19,800 EUR is equivalent to \$23,987.70.

¹ Upon information and belief, Delphi Saginaw Steering Systems is a division within Delphi Automotive Systems LLC.

7. Schaeffler requests that the Debtors provide supporting evidence in support of their objection, to the extent that they affirmatively believe that they paid the invoices listed on Exhibit A.

WHEREFORE, Schaeffler respectfully requests that the Court (i) approve Claim 5907 in the amount of \$23,987.70 against Delphi Automotive Systems LLC, and (ii) grant such other and further relief as proper.

Dated: August 9, 2007

Respectfully submitted,

By: /s/ Matthew B. Stein
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